

## DISCUSSION

Haggerty Communications Group (HCG) was established in 1982 and offers consulting services to communications end users in the both the private and public safety sectors. These services include filing various Federal Communications Commission (FCC) applications. Many of these applications must first be submitted to a frequency coordinator prior to filing with the FCC. Because of it's many years of experience in filing applications, HCG highly approved of the FCC's action, during re-farming, to allow some competition between coordinators. HCG has seen this competition bring greatly improved service and additionally by bring better pricing to the industry.

For those same reasons, HCG supports the expansion of the authorized number of coordinators for the Public Safety Pool (PSP). The FCC's coordination system has the tint of a monopoly. Allowing all PSP users to select the coordinator of their choice, including PCIA, would be another large step removing that tint. Those who support the *status quo* are trying to preserve for themselves the benefits of monopoly service and limit competition.

Because of the experience gained in coordinating the Special Emergency Radio Service (SERS), PCIA has considerable coordination experience in the public safety sector and is equally qualified to along with APCO, IAFC/IMSA, AASHTO and FCCA to coordinate all PSP frequencies.

Traditional Special Emergency Radio Service users are now qualified to use non-SERS Public Safety Pool frequencies with the concurrence of an eligible government entity. SERS users may now apply for a combination of SERS and non-SERS at the same time. These SERS users should be allowed to use their traditional frequency

coordinator, PCIA, for both. With the electronic communications tools available to all frequency coordinators, they can avoid or resolve conflicts with any application being processed by another coordinator and share elements unique to any frequencies that have been exclusively coordinated in the past.

### CONCLUSION

All Public Safety Pool users should be allowed to use the frequency coordinator of their choice, including PCIA, even if the coordinator is not their traditional coordinator. PCIA has the experience to coordinate in the PSP. This action would allow competition and promote better service and pricing to all public sector entities.

Respectfully submitted,

Robert C. Haggerty  
Partner  
Haggerty Communications Group  
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